

After review and discussion with the LDEQ, EPA requests that the Equilibrium Partitioning Sediment Benchmark (ESB) method be revised. The dry weight sediment concentrations compared to the calculated chronic and acute ESB's appear to not be normalized to organic carbon (OC). The EPA guidance on ESB's recommends that since the benchmarks have been developed on an OC normalized basis, then the sediment concentrations should OC normalized before comparison.

Furthermore, EPA requests further clarification and discussion on the suggested Koc of 32,000 L/kg. This value was derived primarily from research in the marine environment. For reference, EPA's regional screening level chemical specific parameters lists a Koc for tri-n-butyltin as 8,100 L/kg.

Lastly, for the estimation of fish tissue concentrations, EPA recommends using the BSAF value that was suggested and approved in the Fish Tissue Sampling Work Plan (Table 7). The Risk Assessment Information System is a well-recognized and reliable source that is updated continuously and would be EPA's preferred source.